

FILED

FEB - 8 2023

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

TAHYON ROBINSON,

Defendant.

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No.

**4:23CR43-RLW/SPM**

**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**

**(Bank Fraud, 18 U.S.C. § 1344(1))**

In a matter affecting interstate commerce, on March 19, 2022, in St. Charles County, within the Eastern District of Missouri, the defendant,

**TAHYON ROBINSON,**

did knowingly devise and execute a scheme to defraud a financial institution and to obtain money, funds, credits and property owned by and under the custody of First Community Credit Union, a financial institution whose deposits were then insured by the National Credit Union Administration, by means of materially false and fraudulent pretenses, representations, and promises when she knowingly used, without lawful authority, the means of identification of P.P., to wit, P.P.'s name, social security number, and date of birth, and completed loan paperwork and received funds in the amount of \$6,500.00.

In violation of Title 18, United States Code, Section 1344(1).

**COUNT TWO**  
**(Aggravated Identity Theft, 18 U.S.C. § 1028A)**

On or about March 19, 2022, in the Eastern District of Missouri, the defendant,

**TAHYON ROBINSON,**

during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), specifically, Title 18 United States Code Section 1344 (bank fraud), did knowingly possess and use, without lawful authority, a means of identification of another person, to wit: the name of P.P., knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A.

**FORFEITURE ALLEGATION**

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 982(a)(2), upon conviction of an offense in violation of Title 18, United States Code, Section 1344 as set forth in Count One, the defendant shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violation.
2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to the offense in Count One.
3. If any of the property described above, as a result of any act or omission of the defendant:
  - a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third party;
  - c. has been placed beyond the jurisdiction of the court;
  - d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided  
without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to  
Title 21, United States Code, Section 853(p).

A TRUE BILL.

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FOREPERSON

SAYLER A. FLEMING  
United States Attorney

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JENNIFER J. ROY #47203MG  
Assistant United States Attorney